

Joseph R. Saveri (SBN 130064)
Daniel E. Barenbaum (SBN 209261)
LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
275 Battery Street, 30th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000

Merrill G. Davidoff (Admitted *Pro Hac Vice*)
Bart D. Cohen (Admitted *Pro Hac Vice*)
Michael J. Kane (Admitted *Pro Hac Vice*)
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103
Telephone: (215) 875-3000

Co-Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re ATM FEE ANTITRUST
LITIGATION

Master File No. C04-2676 CRB

CLASS ACTION

This Document Relates To:

ALL ACTIONS

**DECLARATION OF JOSEPH R. SAVERI IN
SUPPORT OF MOTION TO COMPEL
APPENDING RELEVANT DISCOVERY
REQUESTS AND RESPONSES**

Date: May 17, 2007
Time: 2:00 p.m.
Courtroom: 8
The Honorable Charles R. Breyer

1 I, Joseph R. Saveri, declare as follows:

2 1. I am a partner at the law firm of Lief, Cabraser, Heimann & Bernstein,
3 LLP ("LCHB"), and a member in good standing of the State Bar of California and the State Bar
4 of New York. I submit this declaration in support of Plaintiffs' Motion To Compel All
5 Defendants To Provide Documents Relevant To Plaintiffs' Fourth Set Of Requests For
6 Production Of Documents. I have personal knowledge of the matters set forth herein, and could
7 and would testify competently thereto if called upon to do so.

8 2. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' Fourth
9 Set of Requests for Production of Documents to Concord EFS, Inc. and First Data Corporation,
10 which was served on January 8, 2007.

11 3. Attached hereto as Exhibit B is a true and correct copy of Plaintiffs' Fourth
12 Set of Requests for Production of Documents to Bank Defendants, which was served on
13 January 8, 2007.

14 4. Attached hereto as Exhibit C is a true and correct copy of Defendant First
15 Data Corporation and Concord EFS, Inc.'s Responses and Objections to Plaintiffs' Fourth Set of
16 Requests for Production of Documents, which were served on February 13, 2007.

17 5. Attached hereto as Exhibit D is a true and correct copy of Defendant Bank
18 of America Corporation's Responses to Plaintiffs' Fourth Set of Document Requests, which were
19 served on February 13, 2007.

20 6. Attached hereto as Exhibit E is a true and correct copy of Defendant
21 Citibank N.A.'s Responses and Objections to Plaintiffs' Fourth Set of Document Request
22 Propounded to Bank Defendants, which were served on February 13, 2007.

23 7. Attached hereto as Exhibit F is a true and correct copy of Defendant
24 JPMorgan Chase Bank, N.A.'s Responses to Plaintiffs' Fourth Set of Requests for Production of
25 Documents, which were served on February 13, 2007.

26 8. Attached hereto as Exhibit G is a true and correct copy of Defendant Sun
27 Trust Banks, Inc.'s Responses and Objections to Plaintiffs' Fourth Set of Requests for Production
28 of Documents to Bank Defendants, which were served on February 13, 2007.

